

**Michael C. Worsham**

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October 5, 2021

Magistrate Judge J. Mark Coulson  
U.S. District Court for the District of Maryland  
101 West Lombard Street  
Baltimore, Maryland 21201  
Phone or fax: (410) 962-4953  
Filed electronically

Re: Discovery in *Michael C. Worsham v. Discount Power, Inc.*,  
Case 1:20-cv-00008-RDB (U.S. District Court for Maryland)

Dear Magistrate Judge Coulson,

On September 17, 2021 at 2:00 PM the parties held a one hour conference call with Plaintiff Worsham, and two attorneys for Defendant Discount Power, Inc. (DPI), Thomas C. Blatchley and Brian A. Scotti, using defense counsel's conference calling arrangement. The parties discussed DPI's responses to Worsham's first Interrogatories and Requests for Production of Documents, served on July 31, 2021, and to which DPI emailed responses on August 30, 2021. These were filed on Sep. 27, 2021 as ECF 104-2 and 104-3 as part of my Opposition to Summary Judgment.

On October 1, 2021 defense counsel served on me the Defendant's Supplemental Interrogatory Answers and Responses to Document Requests. These are attached as two Exhibit herein, along with DPI's Sep. 9, 2021 one-page Verification. On October 4, 2021 I sent defense counsel a letter listing remaining disputes in the Supplemental Answers and Responses, with a request to sign an earlier draft of this letter to you.

The parties were not able to resolve all of the disputes over discovery, including DPI's Sep. 9, 2021 Verification page. I write this letter alone, as DPI's counsel has refused to sign a joint letter pursuant to your August 30, 2021 "Memorandum to Counsel Concerning Discovery" (ECF 89). Per your Memorandum, I will send you a letter not to exceed three single-spaced pages summarizing my positions within 24 hours of this letter's filing.

As I do not have conference calling capabilities, other than using Zoom, I request that the Court either use its conferencing, or allow the Defendant's conferencing capabilities to be used, for the expedited telephone conference indicated in your August 30, 2021 discovery Memorandum.

Sincerely,

/s/ *Michael C. Worsham*

Michael C. Worsham  
*Plaintiff*